### IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA PITTSBURGH DIVISION

IN RE:

Keri A Burgwin

Debtor(s)

Ronda J. Winnecour

Movant
vs.

NewRez LLC d/b/a Shellpoint Mortgage
Servicing

Respondent.

### RESPONSE TO INTERIM NOTICE OF CURE OF ARREARS

TO THE HONORABLE JUDGE GREGORY L. TADDONIO:

COMES NOW, NewRez LLC d/b/a Shellpoint Mortgage Servicing, as servicer for The Bank of New York Mellon Trust Company, N.A., fka The Bank of New York Trust Company, N.A., as Trustee for GMACM Home Equity Loan Trust 2006-HE5 (the "Creditor"), hereby files its Response to the Interim Notice of Cure of Arrears (the "Notice") filed on April 13, 2022 (Doc 74), and responds as follows:

## PRE-PETITION MORTGAGE ARREARAGE

1. The Creditor states that its pre-petition arrearage claim (Claim #17-1 filed 10/05/2018) has been satisfied by the trustee payments. The amount of \$16,032.64 was paid by the Trustee.

Respectfully submitted.

/s/ Elizabeth K. Holdren

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Attorney for Creditor

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Response was served on the persons listed below, in the manner listed below on May 5, 2022.

/s/ Elizabeth K. Holdren

Elizabeth K. Holdren, Esq. Attorney ID 78948 Hill Wallack LLP 21 Roszel Road, P.O. Box 5226 Princeton, NJ 08543 Telephone 609-734-6345 Facsimile 609-452-1888

Email: eholdren@hillwallack.com

Attorney for Creditor

#### Via Pre-Paid U.S. Mail:

Keri A Burgwin 743 Horton St Clairton, PA 15025 **Debtor** 

# Via ECF:

Lawrence W. Willis Willis & Associates 201 Penn Center Blvd Suite 310 Pittsburg, PA 15235 **Debtor's Attorney** 

Ronda J. Winnecour Suite 3250, USX Tower 600 Grant Street Pittsburgh, PA 15219 *Trustee*